

MAY 15 2008

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Republican Victory Committee, Inc., a/k/a)
Republican Victory 2004 Committee)
and Jody Novacek, in her official)
capacity as treasurer) MUR 5472
Jody Novacek, in her personal capacity)
Jason Novacek)
Freedra Novacek)
BPO, Inc.)
BPO Advantage LP)

GENERAL COUNSEL'S REPORT #2

I. ACTIONS RECOMMENDED

(1) Find probable cause to believe that the Republican Victory Committee, Inc. a/k/a Republican Victory 2004 Committee and Jody Novacek, in her official capacity as treasurer ("RVC") and Jody Novacek ("Ms. Novacek")¹, in her personal capacity, knowingly and willfully violated 2 U.S.C. § 441h(b)(1);

(2) Find probable cause to believe that the RVC and Jody Novacek, in her official capacity as treasurer, violated 2 U.S.C. § 441d(a) and 441d(c);

(3) Find probable cause to believe that the BPO, Inc. and BPO Advantage LP knowingly and willfully violated 2 U.S.C. § 441h(b)(2);

(4) Find no reason to believe Jason Novacek and Freedra Novacek violated the Act and close the file as to these respondents;

(5) Take no further action in regard to the reason to believe findings that the RVC and Jody Novacek, in her official capacity as treasurer and personal capacity, knowingly

¹ Any reference to Ms. Novacek is intended to refer to her in her personal capacity; any reference to the Committee is intended to include Ms. Novacek in her official capacity as treasurer.

1 and willfully violated 2 U.S.C. §§ 433(a) and 434(a) by failing to file the appropriate
2 reports with the Commission based on prosecutorial discretion;

3 (6) Authorize post-probable cause conciliation;

4 (7) _____

5 (8) Approve the appropriate letters; and

6 (9) _____

7 _____

8 **II. BACKGROUND**

9 This matter was initiated through a complaint filed by the Republican National
10 Committee ("RNC") which alleged that certain solicitations to the public made by the
11 Republican Victory Committee, Inc. a/k/a Republican Victory 2004 Committee ("the
12 RVC") violated the Federal Election Campaign Act of 1971, as amended ("the Act"), by
13 knowingly and willfully fraudulently misrepresenting itself as being affiliated with or
14 acting on behalf of the Republican Party. Based on the information available at the time,
15 including a response from Ms. Novacek, the Commission found reason to believe that:
16 (1) the RVC and Ms. Novacek, in her personal capacity, knowingly and willfully violated
17 2 U.S.C. §§ 433(a) and 434(a) by failing to file the appropriate reports with the
18 Commission; (2) the RVC and Ms. Novacek, in her personal capacity, violated 2 U.S.C.
19 § 441h(b)(1) by knowingly and willfully participating in a scheme or plan designed to
20 fraudulently misrepresent themselves as soliciting funds on behalf of the Republican
21 National Committee; (3) BPO, Inc. and BPO Advantage LP (collectively, "the BPO
22 entities") violated 2 U.S.C. § 441h(b)(2) by knowingly and willfully participating in a
23 scheme or plan designed to fraudulently misrepresent themselves as soliciting funds on

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1 behalf of the Republican National Committee;² and (4) the RVC violated 2 U.S.C.
2 §§ 441d(a) and 441d(c) by failing to affix the appropriate disclaimer to its solicitations.
3 The Commission took no action at that time regarding Jason Novacek and Freeda
4 Novacek although the Complaint named them as respondents.

5 Since the Commission's reason to believe determination,³ our investigation
6 confirmed that Ms. Novacek was the sole individual responsible for both the RVC and
7 the BPO entities and that, through the RVC and the BPO entities, she made fraudulent
8 misrepresentations to vendors and to the general public stating or implying that the RVC
9 was raising money for the Republican Party and/or the RNC.⁴ In response to these
10 fraudulent solicitations, the RVC ultimately received approximately \$75,000 in
11 contributions. See General Counsel's Brief ("GC Brief") at 3, fn. 2 for more information
12 regarding the contributions received by the RVC. Furthermore, the disclaimers added to
13 the solicitations did not conform to the Act's requirements.

² We have addressed the BPO entities collectively. BPO, Inc. was the equivalent of a parent company for BPO Advantage, LP. In addition, with respect to the activities subject to this investigation, the BPO entities operated as a single unit and Ms. Novacek was the sole individual responsible for and acting on behalf of both entities, which, essentially, were her alter egos.

³ Ms. Novacek evaded all attempts at contact for nearly a year and a half. She refused to accept the reason to believe notifications sent via certified mail to her last known address in Texas, and we repeatedly attempted to contact her by using a private process server and through the United States Marshall's office in Dallas. However, neither was successful in locating Ms. Novacek, and Ms. Novacek refused to respond to any notifications left at her door by U.S. Marshalls. We were eventually able to locate and serve Ms. Novacek in Nebraska.

⁴ Ms. Novacek incorporated the RVC in Texas in early 2004. Ms. Novacek essentially was the RVC; no one else assisted her or was an employee or member of, or even a volunteer for, the RVC. In her deposition testimony, Ms. Novacek described herself as the "housewife" or "founder" of the RVC. General Counsel's Brief at 3-4. She conducted all of RVC's activities from her home and had no help, other than the assistance of neighbors to help her take in her mail or open envelopes when she was out of town. *Id.* at 4. She admitted that she alone did all the work for the RVC.

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1 Ms. Novacek was served with the GC Brief, which is incorporated herein by
2 reference setting forth our position on the factual and legal issues of the matter. In
3 response, Respondents dispute many of the factual conclusions discussed in the Brief.
4 See Reply Brief ("RVC Brief"). In particular, Ms. Novacek asserts that the RVC never
5 represented itself to its fundraising vendors⁵, Apex CoVantage, Inc. ("Apex") or
6 Advantage, Inc. ("Advantage"), as working with or on behalf of the Republican National
7 Committee ("RNC"); that any violations of the Act (including the disclaimer violation)
8 were unintentional "rookie mistakes" and not knowing and willful violations of the Act;
9 and that any statements to the contrary regarding the misrepresentations provided by
10 individuals associated with Apex and Advantage are false. See RVC Brief.

11 However, the evidence, including statements from four Apex employees,
12 establishes that Ms. Novacek, acting on behalf of the RVC and BPO entities, made
13 fraudulent misrepresentations to fundraising vendors and to the general public stating or
14 implying that the RVC was raising money for the Republican Party and/or the RNC.
15 Further, Ms. Novacek has not produced any evidence to corroborate her version of the
16 events, namely that she made it clear to both Apex and Advantage employees that she
17 was not working on behalf of the RNC, nor has she provided any evidence impeaching
18 the credibility of the witnesses who provided information regarding her fraudulent
19 misrepresentations.

⁵ As discussed more fully in the GC Brief at pages 4-12, Ms. Novacek crafted a telemarketing fundraising campaign to solicit donations to the RVC, and made all financial and contractual arrangements through BPO. In furtherance of her campaign, Ms. Novacek hired Apex as a subcontractor to make the first set of fundraising calls with mailings requesting the promised contributions and donations. *Id.* at 4. A few months after the program when Apex was terminated, Ms. Novacek began a second set of calls with a different vendor, Advantage. *Id.* Advantage made similar solicitation calls and both sets of solicitation calls garnered a total of approximately \$75,000 in contributions. *Id.* at 5.

1 Accordingly, for the reasons set forth in the GC Brief and discussed below, we
2 recommend that the Commission find probable cause to believe that RVC and Jody
3 Novacek, in her personal capacity, knowingly and willfully violated 2 U.S.C.
4 § 441h(b)(1); probable cause to believe that the RVC violated 2 U.S.C. §§ 441d(a) and
5 441d(c); probable cause to believe that the BPO entities knowingly and willfully violated
6 2 U.S.C. § 441h(b)(2); and exercise its prosecutorial discretion and take no further action
7 in regard to the finding that the RVC and Jody Novacek, in her personal capacity,
8 knowingly and willfully violated 2 U.S.C. §§ 433a and 434(a). We also recommend that
9 the Commission find no reason to believe that Jason and Freeda Novacek, Ms. Novacek's
10 brother and sister-in-law, who were listed as directors of the RVC, violated the Act
11 because it appears they were not involved with the operations of the RVC.

12 **III. ANALYSIS**

13 **A. The Respondents' fraudulent misrepresentations constitute knowing**
14 **and willful violations of the Act.**
15

16 During our investigation, we obtained statements from four Apex employees with
17 whom Ms. Novacek dealt during the contract negotiations between Apex and the RVC as
18 well as the resulting solicitation program. GC Brief at 5-6. These individuals clearly
19 stated that, based on Ms. Novacek's oral and written representations, they believed that
20 the RVC was raising money for the Republican Party and/or the RNC. The written
21 representations include the Statement of Work attached to the contract between Apex and
22 the BPO entities and signed by Ms. Novacek, which described the program as "Outbound
23 Telemarketing Fundraising for the Republican Party" and discussed the revenue split that
24 will go to the "GOP." GC Brief at 6; Attachment 3. Further, the solicitation calls were
25 followed up with letters that included statements, which either explicitly or implicitly

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1 referred to the Republican Party. For example, the letter contains the following
2 statements: "I am grateful that our Party can count on your help to support Republicans
3 across the country win elections." and "The Republican Party can count on my support to
4 help candidates at the state & local level." See Attachment 2.

5 Respondents argue that the RVC never represented to vendors or the public that it
6 was soliciting funds on behalf of the Republican Party or the RNC, although it did
7 consider itself as a "small piece of the Republican marketplace." See RVC Brief at 2.
8 Ms. Novacek contends that she made it clear to the Apex employees, during the course of
9 the contract negotiations and subsequent solicitation efforts on behalf of the RVC, that
10 the RVC was not affiliated with the RNC. *Id.* at 6. She also takes issue with the veracity
11 of the statements provided by the Apex employees, namely Tom Maddux, and claims that
12 Mr. Maddux is being forced to misrepresent the truth in order to retain his employment
13 with Apex. *Id.* at 3. Ms. Novacek also argues that, if the Respondents' actions are
14 viewed as being in violation of the Act, those actions should be considered as the result
15 of unintentional "rookie mistakes" and not knowing and willful violations of the Act. *Id.*
16 at 4, 9.

17 As to the "GOP" reference contained in the Statement of Work, Ms. Novacek
18 offers no specific explanation for its inclusion as part of the Apex contract. She has
19 offered only a general explanation for the misrepresentations in her verbal discussions,
20 contractual agreement and solicitations, namely that she believed she could use such
21 terms since the RVC considered itself as a "small piece of the Republican marketplace."
22 RVC Brief at 4. Ms. Novacek provides the same general explanation for the inclusion of
23 the terms "GOP" and "Republican Party" as well as specific references to candidates in

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1 the follow up letters that were sent to potential contributors after the initial solicitation
2 calls. *Id.* at 10.

3 Ms. Novacek's assertion that all of these individuals, particularly Mr. Maddux⁶,
4 are being untruthful is simply not credible given the fact that Ms. Novacek has provided
5 no reasonable motivation for any of these individuals to misrepresent the truth in this
6 matter. Specifically, Ms. Novacek claims that Mr. Maddux is misrepresenting the truth
7 in an effort to retain his employment with Apex. However, she provides no rationale as
8 to why Mr. Maddux's employment with Apex would be in jeopardy or how his alleged
9 misrepresentation would further his efforts to retain his position with Apex.

10 Additional evidence in this matter includes statements from individuals who
11 received solicitation calls and subsequently contributed to the RVC. RVC Brief at 10.
12 All of these individuals believed that they were being asked to contribute to the
13 Republican Party or the RNC. See GC Brief at 9. Ms. Novacek attempts to cast doubt on
14 the veracity of these individuals, stating that she finds it difficult to believe that these
15 individuals could all recall the specifics of the solicitation calls as well as the beliefs they
16 had when making the contributions after so much time had elapsed. *Id.* Yet, the fact
17 remains that all six contributors have stated their belief that they were giving to a sub-
18 group of the RNC or to a group similar to the National Republican Senatorial Committee,
19 and all believed that their money was going to be used toward the re-election of President
20 Bush. See GC Brief at 9.

⁶ Mr. Maddux was the Group President of Apex and responsible for the Knowledge Processing Outsourcing Group which handled the company's call center business. Although, Mr. Maddux had only recently begun working with Apex in 2003 when he was approached by Ms. Novacek about hiring Apex, he had been personally acquainted with Ms. Novacek for many years prior to that time.

1 Based on the available evidence set forth above, the RVC and Ms. Novacek
2 violated § 441h(b)(1) by making phone calls, mailing letters and entering into agreements
3 for the purpose of soliciting contributions while misrepresenting that they were acting
4 under the authority of the Republican Party. In addition, the violations of the Act were
5 knowing and willful. See GC Brief at 17. The evidence establishes that these are not the
6 misguided actions of a "rookie" but rather the deliberate and intentional actions of an
7 individual well versed in the political telemarketing area as demonstrated by Ms.
8 Novacek's own testimony. GC Brief at 3. Ms. Novacek had extensive personal
9 experience working with bona-fide Republican-affiliated entities, including candidates,
10 candidate authorized political committees, the RNC, and state parties. However, it is
11 important to note that Ms. Novacek repeatedly refers to the Respondents' fraudulent
12 misrepresentations as merely "rookie mistakes," while at the same time providing a
13 detailed description of her knowledge and experience in telemarketing fundraising for
14 political clients. See RVC Brief at 5, 8-9 and 12; see also GC Brief at 3. Based on the
15 breadth of her knowledge and experience in this area, Ms. Novacek was aware or should
16 have been aware that the use of the wording "Republican Party," "GOP," "RNC" and
17 referencing specific candidates such as George Bush in her conversations with Apex
18 personnel, the Apex contract, phone solicitations and follow up letters would reasonably
19 give Apex and potential contributors the impression that the RVC was raising funds on
20 behalf of the Republican Party or the RNC.

21 Furthermore, because the RVC was operated solely by Ms. Novacek, it was the
22 legal entity that financially "benefited" from Ms. Novacek's actions, had no existence
23 other than through the actions of Ms. Novacek and acted as her alter ego, we believe

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1 there is sufficient evidence that the RVC should be held responsible for knowingly and
2 willfully fraudulently misrepresenting itself as part of the Republican Party and/or the
3 RNC. See 2 U.S.C. § 441h(b)(1). Similarly, because Ms. Novacek also was the only
4 individual responsible for the BPO entities and because the BPO entities entered into
5 contracts on behalf of the RVC to make the solicitation calls in question, we believe that
6 the BPO entities also should be held responsible for knowingly and willfully participating
7 in or conspiring to participate in a scheme or plan to fraudulently misrepresent the RVC
8 as representing the Republican Party and/or RNC. See 2 U.S.C. § 441h(b)(2).

9 **B. The RVC violated the disclaimer provision of the Act.**

10
11 The RVC made more than 500 solicitation phone calls of an identical or
12 substantially similar nature within a 30-day period. See GC Brief at 10-12. See also
13 11 C.F.R. §§ 100.26, 100.28. Nonetheless, although the calls and the follow-up letters
14 stated that they were made (in the case of the calls) or paid for (in the case of the letters)
15 by the "Republican Victory Committee," it is undisputed that the call script did not
16 contain a sufficient disclaimer as to who paid for or authorized the calls despite the fact
17 that they were direct solicitations for donations, and the disclaimer on the letter was not
18 in a box and did not contain the street address, telephone number or World Wide Web
19 address of the RVC as required by 2 U.S.C. § 441d(a); 11 C.F.R. § 110.11(a). See
20 Attachment 2. Ms. Novacek admitted that she knew she needed to use a disclaimer on
21 the calls and mailers because of her prior political work. GC Brief at 21. She claimed
22 that she thought her disclaimer was "in compliance," but also admitted that, despite her
23 repeated references to election law in correspondence with Apex and Advantage and in
24 the solicitations made by Advantage which gave the impression that she was somewhat

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1 knowledgeable about the legal requirements, she never read the Act or Commission
2 regulations. *Id.*

3 Ms. Novacek, in the RVC's brief, has offered no new defense regarding the lack
4 of an appropriate disclaimer on the letters and phone calls except to add that it was a
5 "first time around the block" mistake. RVC Brief at 9. Therefore, we recommend that
6 the Commission find probable cause to believe that the RVC and Ms. Novacek, in her
7 official capacity as treasurer violated 2 U.S.C. §§ 441d(a) and 441d(c).

8 C. Jason and Freeda Novacek were not involved with the operations of the
9 RVC and, therefore, have not violated any provision of the Act.

10
11 Jason Novacek is Ms. Novacek's brother; his wife is Freeda Novacek. Dep. at
12 100:4-6. They are listed as directors of the RVC on the articles of incorporation filed in
13 Texas, as well as the Form 8871 filed with the IRS. Attachment 1. They were referenced
14 in the Complaint as potential respondents and were notified accordingly; the Commission
15 has not yet taken any action with respect to them.

16 Ms. Novacek claimed that neither Jason nor Freeda Novacek were involved in
17 any actual activities engaged in by the RVC, had no knowledge of any details of the
18 RVC, and did not give any advice or have any input into the RVC's activities. See Dep.
19 at 104:16-105:1.⁷ Neither Mr. Muddux (Apex) nor Mr. Butzke (Advantage) ever did any
20 work with or recall ever hearing about Jason or Freeda Novacek. Other than the articles
21 of incorporation and Form 8871 prepared and filed by Ms. Novacek, Jason and Freeda

⁷ Ms. Novacek initially claimed that Jason and Freeda Novacek knew their names were listed as directors on the forms; however, later she implied that they had "generally" agreed to work for the Committee and that the only conversations Ms. Novacek had with Jason and Freeda Novacek appear to have been casual conversations among family members. Dep. at 104:16-22.

1 Novacek do not appear on any other documents or in any other correspondence relating
2 to the RVC.

3 In addition, even on the forms prepared by Ms. Novacek, the address for Jason
4 and Freeda Novacek is actually Ms. Novacek's home address in Texas. Attachment 1.
5 Therefore, it appears that neither Jason nor Freeda Novacek were actually involved in any
6 way with the RVC. For those reasons, we recommend that the Commission find no
7 reason to believe that Jason and Freeda Novacek violated the Act.

8 **D. The Commission should exercise its prosecutorial discretion and take no**
9 **further action in regard to the reason to believe finding that the RVC and**
10 **Jody Novacek, in her personal capacity, knowingly and willfully violated**
11 **2 U.S.C. §§ 433(a) and 434(a).**
12

13 The Commission previously found reason to believe that the RVC and Jody
14 Novacek, in her personal capacity, knowingly and willfully violated 2 U.S.C. §§ 433(a)
15 and 434(a) by failing to file the appropriate disclosure reports with the Commission. In
16 light of the other serious violations at issue in this matter, we did not include a discussion
17 of these issues in the GC Brief. Therefore, we recommend that the Commission exercise
18 its prosecutorial discretion and take no further action regarding these violations. See
19 *Heckler v. Chaney*, 470 U.S. 821 (1985).

20 **IV. DISCUSSION OF CONCILIATION AND CIVIL PENALTY**

21 We recommend that the Commission enter into post-probable cause conciliation
22 with the Respondents.

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V. RECOMMENDATIONS

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1. Find probable cause to believe that the RVC and Jody Novacek, in her personal and official capacities, knowingly and willfully violated 2 U.S.C. § 441h(b)(1);

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2. Find probable cause to believe that the RVC and Jody Novacek, in her official capacity, violated 2 U.S.C. §§ 441d(a) and 441d(c);

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3. Find probable cause to believe that the BPO entities knowingly and willfully violated 2 U.S.C. § 441h(b)(2);

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4. Take no further action in regard to the reason to believe findings that the RVC and Jody Novacek, in her personal and official capacities, knowingly and willfully 2 U.S.C. §§ 433(a) and 434(a) based on exercise of prosecutorial discretion;

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5. Find no reason to believe Jason and Freeda Novacek violated the Act and close the file as to these respondents;

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6. Authorize post-probable cause conciliation;

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Date

5/15/2008

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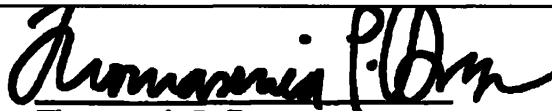
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Thomasenia P. Duncan
General Counsel

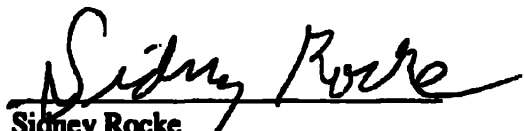


Kathleen Guith
Acting Deputy Associate General
Counsel for Enforcement

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Sidney Roche
Assistant General Counsel


Kimberly Hart
Attorney

Attachments:

1. Articles of Incorporation for Republican Victory Committee, Inc.
 2. RVC Mailer for Apex Calls
-



Secretary of State
P.O. Box 19887
Austin, TX 78711-3887
FAX: 512/463-5708

Filing Fee: \$25

**Articles of Incorporation
Pursuant to Article 3.02
Texas Non-Profit
Corporation Act**

The corporation formed is a non-profit corporation. The name of the corporation is as set forth below:

The Republican Victory Committee, Inc.

The name must not be the same as, deceptively similar to that of an existing corporate, limited liability company, or limited partnership name on file with the Secretary of State. A preliminary check for the "name availability" is recommended.

☐ A. The initial registered agent is an organization (cannot be corporation named above) by the name of:

OR

☒ B. The initial registered agent is an individual resident of the state whose name is set forth below:

First Name	MI	Last Name	Suffix
Jody		Novacek	

C. The business address of the registered agent and the registered office address is:

Street Address	City	State	Zip Code
1221 Lakeridge Lane	Irving	TX	75063

A. Management of the affairs of the corporation is to be vested in the members of the corporation:

OR

B. Management of the affairs of the corporation is to be vested in its board of directors. The number of directors, which must be a minimum of three, that constitutes the initial board of directors and the names and addresses of the persons who are to serve as directors until the first annual meeting or until their successors are elected and qualified are set forth below:

Director 1: First Name	MI	Last Name	Suffix
Jason		Novacek	

Street Address	City	State	Zip Code
1221 Lakeridge Lane	Irving	TX, USA	75063

Director 2: First Name	MI	Last Name	Suffix
Freda		Novacek	

Street Address	City	State	Zip Code
1221 Lakeridge Lane	Irving	TX, USA	75063

Director 3: First Name	MI	Last Name	Suffix
Jody		Novacek	

Street Address	City	State	Zip Code
1221 Lakeridge Lane	Irving	TX, USA	75063

☒ A: The corporation will have members. ☐ B: The corporation will not have members.

The period of duration is perpetual.

ATTACHMENT 1

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The corporation is organized for the following purpose or purposes:
A conservative, Republican-leaning group focusing on voter mobilization and
issue advocacy.

[The attached addendum, if any, is incorporated herein by reference.]

☒ A. This document will become effective when the document is filed by the secretary of state.

OR

☐ B. This document will become effective at a later date, which is not more than ninety (90) days from the date of its filing by the
secretary of state. The delayed effective date is:

The name and address of the incorporator is set forth below.

Jody Novacek 1221 Lakewood Lane, Irving, TX 75063

The undersigned incorporator of these articles of incorporation subject to the penalties imposed by law for the submission of a false or fraudulent
document.

Jody Novacek

Signature of Incorporator.

FILED OFFICE COPY

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Republican Victory 2004 Committee

2117 L Street NW # 125 • Washington, DC 20037-1524

March 10, 2004

«FirstName» «LastName»
«Address1»
«City», «ST» «ZIP»

DEAR «FirstName»,

Thank you for speaking with my assistant «Agent» by telephone recently and your generous pledge of \$«PLD»00. I'm grateful our Party can count on your help to support Republicans across the country win elections. We are fortunate to have President Bush in the White House and our top priorities are to improve the American economy and defeat Democrats at all levels. Your gift will help local and state candidates running for office in your state. Strong support at the local and state levels will help get Republicans to the polls in November.

As you've heard on the evening news, the Democrats are hard at work raising money and distorting the Republican record and agenda. Your pledge of \$«PLD»00 is critical in our efforts to build support for Republicans at all levels as we prepare for the November elections. I hope you'll send your generous gift promptly.

Please return the receipt below to ensure your gift is processed properly. For your convenience, we've enclosed a postage-paid, stamped envelope. Thank you again!

Sincerely,

Anna Collins

Anna Collins
Membership Chairman

----- (cut here & return receipt with your pledge) -----

MAIL TO:
Republican Victory 2004 Committee
2117 L Street NW # 125
Washington, DC 20037-1524

FROM: «FirstName» «LastName»
«Address1»
«City», «ST» «ZIP»
APX030904

The Republican Party can count on my support to help candidates at the state & local level. I'm proud to help our Party prepare for the November election. My contribution is enclosed:

() \$«PLD»00 () \$_____ Other

Please make your check or money order payable to: Victory 2004.

Federal election law requires us to report the following information:

Occupation: _____ Employer: _____

() Check if Retired

() Check if Self-Employed

Contributions or gifts to the Republican Party are not deductible as charitable contributions for federal income tax purposes. Paid for by the Republican Victory 2004 Committee and not authorized by any candidate or candidate committee. Thank you for your support!

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